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*Attorneys for Defendant Facebook, Inc.,*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF ALEXANDER  
SWANSON IN SUPPORT OF  
FACEBOOK'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL**

I, Alexander P. Swanson, hereby declare as follows:

1. I am an associate at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bar of California. I submit this declaration in support of Facebook’s Administrative Motion to Seal. I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. Attached as **Exhibit A** is a true and correct **redacted** version of Special Master Garrie’s October 21, 2021 Order Regarding Facebook’s Motion for Protective Order Against Production of API Call Logs (the “Order”).

3. Attached as **Exhibit B** is a true and correct **unredacted** version of the Order.

4. The Order and supporting exhibits contain confidential information relating to Facebook’s API Call Log tables.

5. The Order and supporting exhibits contain quotations from and descriptions of documents Facebook designated Confidential under the Protective Order in this case. Dkt. 122.

6. I am informed and believe that the facts relating to Facebook’s API Call Log tables disclosed in the Order may reveal Facebook’s confidential business information, strategies, and relationships, including Facebook’s cutting-edge, proprietary data storage and management technology and capabilities, that its competitors could use to its commercial disadvantage. I am informed and believe that information about or from Facebook’s databases and the structure of those databases disclosed in the Order would give competitors of Facebook an unfair advantage in implementing their own information management systems by examining the systems that Facebook created and designed for its own internal use.

7. I am informed and believe that disclosure of this information would make it easier for hackers, spammers, or other bad actors to use this information to compromise Facebook’s security systems.

8. I am informed and believe that quotations and descriptions from documents designated Confidential reveal Facebook’s confidential business information, strategies,

relationships, and financial information, and if publicly disclosed, Facebook's competitors could take advantage of this commercially sensitive information to cause Facebook competitive harm.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 30, 2021 in Los Angeles, California.



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Alexander P. Swanson